

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Application of DAVID A. GODFREY,
YUKOS FINANCE B.V. and YUKOS
INTERNATIONAL UK B.V. for an order to
conduct discovery for use in a foreign
proceeding.

Petitioners.

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: No. 1:15-MC-325
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**RESPONDENTS' NOTICE OF
MOTION TO QUASH SUBPOENAS AD TESTIFICANDUM**

PLEASE TAKE NOTICE that upon the Memorandum of Law in Opposition to
Petitioners' Motion to Compel Compliance with Subpoenas *Duces Tecum* and in Support of
Respondents' Motion to Quash Subpoenas *Ad Testificandum*; the Declaration of Jeffrey Johnson;
the Declaration of Richard Deitz; the Declaration of Jessica Oliff Daly and the exhibits attached
thereto; and in accordance with the briefing schedule agreed to by the parties and so-ordered by
this Court on November 23, 2015, Respondents Jeffrey Johnson, Richard Deitz, and VR Capital
by and through their attorneys, Akin Gump Strauss Hauer & Feld LLP, will move this Court at
such time and place as the Court designates, before the Honorable Victor Marrero, at the United
States Courthouse located at 500 Pearl Street, New York, New York 10007 for an Order denying
Petitioners' Motion to Compel Compliance with Subpoenas *Duces Tecum* and granting
Respondents' Motion to Quash Subpoenas *Ad Testificandum*, pursuant to the doctrines of *res
judicata*, Federal Rule of Civil Procedure 45(c), and 28 U.S.C. § 1782(a) and for any further
relief that the Court may deem just and proper.

Dated: December 8, 2015
New York, New York

Respectfully Submitted,

/s/ Robert H. Pees

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